

BHL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

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FILED

2023 JUN -8 P 1:00

Michael A. LEE JR.,

Plaintiff,

V.

CASE NO: 22-CV-0930-BHL

Gina M. Ambasan,

Defendant,

**PLAINTIFF'S FIRST SET OF WRITTEN INTERROGATORIES AND REQUEST FOR PRODUCTION OF
DOCUMENTS**

Plaintiff, Michael A. Lee, by pro se, submits the following interrogatories and request for production of documents to defendant, Gina M. Ambasan, to be answered within (30) days:

TO: Counsel of Mrs. Gina M. Ambasan
840 Lake Avenue,
Suite 300
Racine, Wisconsin 53403

INSTRUCTIONS

If any of the following Interrogatories cannot be answered in full, please answer to the extent possible, specifying the reason for your inability to answer the remainder, and stating whatever information you have concerning the unanswered portion.

These interrogatories are deemed to be continuing in nature. If you or anyone representing your interests should become aware of or acquire additional information which affects the accuracy or completeness of any given answer or which relates to matters into which these Interrogatories inquire, it is demanded that such knowledge be promptly transmitted to the Defendant by way of supplemental answers.

Interrogatory No.1: How long have you been a correctional officer for the Department of corrections?

Interrogatory No.2: How is your role as a correctional officer important to the mission and functions of the department of corrections?

Interrogatory No.3: What is your understanding of Executive directive number 72, which is the sexual abuse and sexual harassment in confinement or better known as PREA?

Interrogatory No.4: How often are you trained in those subjects in PREA?

Interrogatory No.5: Have you ever been under investigation while working as an officer of the Department of Corrections? If yes, please state;

1. When did this investigation take place?
2. Why did the investigation come about?
3. Where the location or institution the investigation was had taken place?
4. What was the outcome of the investigation?

Interrogatory No.6: Has an inmate ever made any attempt to call your phone number or any other phone number that you owned or had possession or linked to you at any time?

Interrogatory No.7: Have you ever engaged in any inappropriate phone conversations that are considered a breach in the Prisons security system?

Interrogatory No.8: Have you ever been in a personal/inappropriate relationship with an inmate(s) inside or outside of the Department of Corrections?

Interrogatory No.9: Have you ever assisted in security, supervising an inmate while they performed essential work duties as far as kitchen server workers, staff bathroom custodians?

Interrogatory No.10: Have these security details in any way, **ever** consisted of you being isolated with an inmate for any reasons?

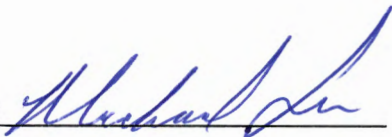
Interrogatory No. 11: Have you ever engaged in any sexual acts with any inmate as far as kissing, groping, sexual intercourse, etc.?

Request for production of documents

You are hereby requested to produce the following described documents within thirty (30) days to Michael A. Lee #505955 Redgranite Correctional Institution, Redgranite Wisconsin 54970, for purposes of inspection and copying

Request No.1: All documents referred to or relied upon in preparing your answers to these Interrogatories.

Dated on the 4th of June, 2023

By: 

Michael A. Lee #505955

Redgranite Correctional Institution

Po Box 925

Redgranite WI 54970

Michael Lee #505955
Redgranite Correctional Institution
PO Box 935
Redgranite WI 54970

United States District Court
Eastern District of Wisconsin
Room 362

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Milwaukee WI 53202-458299

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